REMARKS/ARGUMENTS

In view of the remarks herein, favorable reconsideration and allowance of this application are respectfully requested. By this Amendment, claim 21 has been amended. Thus, claims 21 and 23 are pending for further examination.

Claims 21 and 23 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Martin et al. (U.S. Patent No. 5,355,302), in view of Wilder (U.S. Patent No. 5,408,417), Banks et al. (U.S. Patent No. 5,559,714) and Alavi (U.S. Patent No. 5,970,467). This four-way § 103 rejection is respectfully traversed for at least the following reasons.

Applicant is concerned that the claim 21 recitation that "the at least one requested song is determined as a function of answers saved in a questionnaire response file in the memory" has been improperly confused with a method called "collaborative filtering." To help flesh out the structure and function captured by this language, Applicant notes that the original specification explains that a user can use a song request routine to request, and a suitable display to select, at least one new song for download from the host server. This previous requesting and selecting step is a predetermined event that triggers the display of a questionnaire to be completed by the user using the touch screen, which is operable to accept customer input corresponding to the answers to the questions. Then, the questionnaire is sent to the host server in order to be saved into its memory, with a determination routine being provided to determine whether the questionnaire is completed. In response to the reception and registration of each completed questionnaire, on the one hand, the user receives a reward thanks to a reward routine and, on the other hand, the host server or the audiovisual reproduction system counts the number of times that the requested song has been selected by users and compares this number to a predetermined threshold. When the number of times that the requested song is selected exceeds the

predetermined threshold, the audiovisual reproduction system sends a request to the host server to request that the selected song is downloaded from the host server to the audiovisual reproduction system. In this way, the user is rewarded for having completed the questionnaire, and interested parties are assured that they have obtained a predetermined number of completed questionnaires, corresponding to said threshold, for each new song that is downloaded.

To make this operation explicit, claim 21 has been amended to make clear that the jukebox system comprises "a song request routine for requesting at least one new song for download from the host server, wherein the at least one requested song is determined as a function of answers saved in a questionnaire response file in the memory and as a function of number of completed and saved questionnaires . . . wherein, when the number of completed and saved questionnaires related to the same selected song exceeds a predetermined threshold, the audiovisual reproduction system sends a request to the host server to request that the selected song is downloaded from the host server to the audiovisual reproduction system." These features are not taught or suggested by the prior art of record, alone or in combination. Thus, Applicant respectfully submits that the alleged four-way combination does not render obvious claim 21 or claim 23. Accordingly, reconsideration and withdrawal of the outstanding § 103 rejection is respectfully requested.

In view of the foregoing remarks, withdrawal of the rejections and allowance of this application are earnestly solicited. Should the Examiner have any questions regarding this application, or deem that any formalities need to be addressed prior to allowance, the Examiner is invited to call the undersigned attorney at the phone number below.

Respectfully submitted,

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